General Volume

Monitoring & Compliance Section

Dual Participation (1.06150)

ER# 1.06150

Authority 7CFR 246.7(j)(1), 246.7(l), 246.12(u)

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POLICY: The State agency is responsible for providing the means of identifying participant

dual participation.

The local WIC provider (LWP) must take precautions to prevent dual participation (Refer to <u>ER# 3.01800</u>) and must explain to all participants, parents, and guardians that dual participation is illegal. Refer to <u>ER# 2.03200</u>.

The LWP must investigate all suspected incidents of dual participation in accordance with ER# 1.06200.

## PROCEDURES:

A. Dual participation is defined as receiving and spending program benefits:

- 1. More than once a month from the same LWP in Missouri.
- 2. During the same month from two LWPs in Missouri.
- 3. During the same month from a LWP in Missouri and a LWP in another state.
- 4. During the same month from both WIC and the Commodity Supplemental Food Program.
- B. The State agency will put procedures in writing to prevent and identify dual participation with each state agency that borders Missouri.
  - 1. At least semi-annually, the State agency will exchange specific and confidential participant identifying information with bordering state agencies.
    - a. The Missouri information will be only from counties sharing a contiguous border with the other state.
    - b. The other state information will be only from counties sharing a contiguous border with Missouri.
  - 2. Semi-annually, the Missouri WIC Program will exchange specific and confidential participant identifying information with the Missouri CSFP (both located in the Missouri Department of Health and Senior Services).
- C. The local WIC provider must review the quarterly Dual Participation Report in MOWINS to check for instances of dual participation/double issuance. The LWP must investigate and submit to the State WIC office an explanation for each participant listed on the report as to why the participant receives FIs more than once a month or from two service providers during the same month.
- D. The State agency will contact the local WIC provider when dual participation is

suspected between WIC and CSFP or with another state. The contact will be within 30 days of detection.

- E. The local WIC provider(s) involved must:
  - 1. Investigate all suspected dual participation within 30 days of notification or detection in accordance with ER# 1.06200.
  - 2. Report suspected dual participation to the State-agency-assigned contact no later than 30 days after concluding the investigation. The local WIC provider should report as early as possible to ensure the dual participation is quickly stopped.
- F. When the dual participation is between Missouri WIC providers, the State agency and the local agencies will determine from which service site the participant must be immediately terminated.
- G. When the dual participation is between WIC and CSFP in Missouri or with another state WIC program, the State agencies will determine from which service site the participant must be immediately terminated.
- H. In all cases, the local WIC provider(s) involved must take follow-up action on dual participation in accordance with <u>ER# 1.06200</u>.
- I. In accordance with federal WIC regulations, when dual participation results from intentional misrepresentation, the State agency will:
  - 1. Disqualify the participant from both programs; and
  - 2. Take action to collect the improperly issued benefits.